

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**STIPULATION FOR ENTRY OF ORDER WITHDRAWING AND
EXPUNGING CLAIM NUMBER 2935 AND EXTENDING TIME FOR
SENIOR ACCOUNTANTS, ANALYSTS, AND APPRAISERS
ASSOCIATION (SAAA) TO RESPOND TO OBJECTION TO CLAIMS 2859**

SAAA Union – Members and Senior Accountants, Analysts, and Appraisers Association (SAAA), (“Claimants”), and the City of Detroit, Michigan (“City”), by and through their undersigned counsel, hereby stipulate and agree as follows in support of the entry of the *Order Extending Time for SAAA Union – Members and Senior Accountants, Analysts, and Appraisers Association (SAAA) to Respond to Objection to Claims 2859 and 2935*.

1. SAAA Union - Members filed Claim Number 2859 (“Claim 2859”).
2. Senior Accountants, Analysts, and Appraisers Association (SAAA) filed Claim Number 2935 (“Claim 2935”).
3. On March 7, 2019, the City filed its Sixty-Fourth Omnibus Objection to Certain Claims (No Valid Basis for any Liability of the City) [Doc. No. 13016] (“Objection”). Claim 2859 and Claim 2935 were among the claims subject to the Objection.

4. Counsel for Claimants and counsel for the City had previously conferred regarding the City's Objection to Claim 2859 and Claim 2935 and by order entered on their stipulation [Doc. No. 13041], the Court extended the deadline for Claimants to respond to the City's Objection through and including April 22, 2019.

5. Counsel for Claimants and counsel for the City have further conferred regarding the City's Objection to Claim 2935 and have agreed that Senior Accountants, Analysts, and Appraisers Association (SAAA) withdraws Claim 2935 as it is duplicative of proof of claim number 2851 filed by the Coalition of Detroit Unions.

6. Counsel for Claimants and counsel for the City have further conferred regarding the City's Objection to Claim 2859 and have agreed to further extend the deadline for SAAA Union - Members to respond to the City's Objection to Claim 2859 through and including June 12, 2019 and to adjourn the hearing on the objection to Claim 2859 to June 19, 2019.

WHEREFORE, the City and the Claimant respectfully request that the Court enter an order in the form attached as Exhibit 1 hereto.

Respectfully submitted,

<p>MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.</p> <p>By: <u>/s/ Marc N. Swanson</u> Marc N. Swanson (P71149) 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-8451 swansonm@millercanfield.com</p> <p><i>Attorneys for the City of Detroit</i></p>	<p>SCHEFF & WASHINGTON, P.C.</p> <p>By: <u>/s/ George B. Washington</u> George B. Washington 615 Griswold, Suite 910 Detroit, MI 48226 Telephone: 313-963-1921 scheff@ameritech.net</p> <p><i>Attorneys for SAAA Union – Members and Senior Accountants, Analysts, and Appraisers Association (SAAA)</i></p>
---	--

Dated: May 10, 2019

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**ORDER WITHDRAWING AND EXPUNGING CLAIM NUMBER 2935
AND EXTENDING TIME FOR SENIOR ACCOUNTANTS, ANALYSTS,
AND APPRAISERS ASSOCIATION (SAAA) TO RESPOND TO
OBJECTION TO CLAIMS 2859**

Upon the Stipulation for *Order Withdrawing and Expunging Claim Number 2935 and Extending Time for Senior Accountants, Analysts, and Appraisers Association (SAAA) to Respond to Objection to Claim 2859*¹ and the Court being otherwise fully informed:

IT IS ORDERED THAT:

1. Claim 2935 is hereby withdrawn and expunged.
2. The deadline for SAAA Union - Members to respond to the City's Objection to Claim 2859 is hereby extended through and including June 12, 2019 and that the hearing on the objection to Claim 2859 is adjourned to June 19, 2019.
3. The City's claims agent is authorized to update the claims register to reflect the relief granted in this Order.

¹ Capitalized terms used but not otherwise defined in this Order shall have the meanings given to them in the Stipulation.